

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BRIANA RAE HARRIS, on behalf of :
herself and all persons similarly :
situated, :
Plaintiff, :
v. :
REBELZ CLUB, LLC, et al., :
Defendants. :

Civil Action No.: 4:22-111-MWB

PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION

Plaintiff Briana Rae Harris, on behalf of herself and other similarly-situated past and current Dancers employed by Defendant Rebelz Club, LLC, d/b/a Rebelz Gentlemen’s Club (“Rebelz”), Defendant Heather Varando (“Heather”) and Defendant Pablo Varando (“Pablo”) (collectively “Defendants”), by and through undersigned counsel, and for the reasons set forth in the attached Memorandum of Law and pursuant to 29 U.S.C. § 216(b), respectfully request that this Court:

1. Conditionally certify a class of all persons who are working or have worked as a Dancer at Rebelz Club, LLC, d/b/a Rebelz Gentlemen's Club at 601

Spruce Road, Moshannon, Pennsylvania, 16859, at any time since February 16, 2019 (collectively “Dancers” or the “FLSA Class”);¹

2. Order Defendants to produce to Plaintiff’s counsel the names, last known addresses, telephone numbers, and email addresses of all potential members of the FLSA Class within ten (10) days of the date of Order; further Order Defendants to post notices in conspicuous locations at 601 Spruce Road, Moshannon, Pennsylvania, 16859.

3. Permit Plaintiff to issue notice to all potential members of the FLSA Class by first-class mail, email, and text message informing them of their right to opt in to this case;

4. Order an opt-in period of sixty (60) days, beginning from the date of Plaintiff’s first issuance of notice;

5. Allow Plaintiff to send reminder notices by email and text message to all potential members of the FLSA Class who have not yet responded to notice within thirty (30) days of the first issuance of notice;

6. Approve Plaintiff’s proposed form of notice, attached hereto as Exhibit 4, and Plaintiff’s proposed Opt-In Consent Form, attached hereto as Exhibit 5, to be included in the issuance of notice pursuant to paragraphs 2-5.

¹ With regard to those who have already filed a signed consent form with the Court, those members of the FLSA Class have an earlier limitations period, tolled as of the dates of their filings.

Dated: February 16, 2022

Respectfully Submitted,

GOODLEY MCCARTHY LLC

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